

3/13/2019

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

Affiant, Adam D. West, having been duly sworn according to law, deposes and states:

**Introduction**

1. I am a Special Agent with the United States Drug Enforcement Administration (DEA) currently assigned to the Cleveland District Office.
2. This affidavit is being submitted for the limited purpose of establishing probable cause that Darnell White (DOB: 9/25/1978), of Cleveland, OH has violated Title 21 U.S.C. Section 841(a)(1) and (b)(1)(B) [possession with intent to distribute controlled substances] and Title 18 U.S.C. Section 922(g) [possession of a firearm by a prohibited person]. The statements contained in this affidavit are derived from information provided to me by members of the Cleveland Police Department (CPD), Ohio, the Toledo Resident Office of the Drug Enforcement Administration (DEA), other members of the Cleveland Resident Office of the DEA, and members of the Ohio State Highway Patrol, as well as my own investigation of this matter. This affidavit does not include every fact known to me regarding this investigation, but will seek to summarize relevant information.

3/13/2019

**Affiant's Qualifications**

3. Affiant received specialized training at the DEA Training Academy in Quantico, Virginia, regarding the identification of narcotic controlled substances and the operation of drug trafficking organizations. Affiant has written and executed search warrants which have resulted in the seizure of illegal drugs and evidence of drug violations. Affiant has supervised the activities of informants who have provided information and assistance in the prosecution of drug offenders. Based upon the above experience, your Affiant is familiar with the modus operandi of persons involved in illicit distribution of controlled substances as well as the terminology used by persons involved in the illicit distribution of controlled substances. Affiant is aware that persons involved in the illicit distribution of controlled substances often attempt to conceal their identities as well as the locations at which drug transactions occur and where drugs and drug records are stored. These individuals are also known to have vehicles, properties, utilities, and other items purchased in the names of others in order to conceal the association of drug activities with financial transactions. Affiant knows that drug traffickers often place assets in the names of spouses and relatives in order to avoid detection and to help

3/13/2019

shield the assets from seizure and forfeiture by law enforcement authorities. Affiant knows that individuals engaged in organized drug distribution and sales maintain extensive contact with persons from whom they receive drugs and with whom they distribute these drugs. Maintaining extensive contact with suppliers, customers and associates requires that drug traffickers have continuous access to telephone and internet communications, including cellular telephones (traditional and pre-paid). Affiant also knows that drug traffickers are increasingly using cellular phones with the ability to send text messages, pictures, video and other electronic forms of communication. Through investigation, training, and monitoring of Title III interceptions, Affiant has become familiar with the types and amounts of profits made by drug traffickers and the methods, language, and terms which are used to disguise the source and nature of the profits from their illegal drug sales.

**Probable Cause**

4. On March 13, 2020, at approximately 10:32 a.m., a search team consisting of members of Cleveland District Office of the DEA, Toledo Resident Office of the DEA, Cuyahoga County Sherriff's Office, and Ohio State Patrol executed a search

3/13/2019

warrant at 7500 Dudley Avenue, Cleveland, OH, the residence of Darnell White. The warrant was issued by the Cuyahoga County Court of Common pleas on March 13, 2020 to search for evidence of narcotics trafficking including illegal narcotics, paraphernalia, weapons, cash, and cellular phones in the above-referenced residence.

5. Darnell White was the only person located inside the residence, and he was found in the basement.
6. In the basement of the residence, in close proximity to where White was found upon entry, Agents located approximately 1,225 grams of suspected cocaine, 479 grams of a suspected heroin/opioid mixture, 97 grams of suspected methamphetamine, and approximately 25 pounds of suspected marijuana. Based on Affiant's training and experience, Affiant believes that the color, consistency, packaging, and other appearance of each of the suspected controlled substances listed above is consistent with those specific controlled substances.
7. In addition to the above-referenced suspected controlled substance, agents located multiple pieces of drug trafficking tools and paraphernalia, including scales, packaging materials, and a kilogram press.

3/13/2019

8. Under the living room couch, agents located a Taurus 9mm handgun with Serial # TJS 33 835. The Taurus firearm was loaded, including a round in the chamber.
9. Darnell White was advised of his rights under Miranda by your Affiant, as witnessed by DEA TFO Ronald Brotherton during the execution of the search warrant. White asked to speak to an attorney, and he was allowed to do so.
10. Your affiant is aware that there are no manufacturing sites/plants for Taurus firearms within the state of Ohio. This was confirmed again today by review of the Taurus website. Additionally, upon my review of the firearm seized from White on this date, I observed that the firearm itself indicates that it was manufactured in Brazil. Therefore, I believe there is probable cause to believe that the firearm located in White's residence did travel in interstate commerce.
11. Publicly available records posted online by the Cuyahoga County Court of Common Pleas show that White has been convicted of multiple felonies, to wit: on or about February 17, 2015, in case number CR-14-587553-A, White was convicted of Having Weapons Under Disability, a felony of the third degree; and on or about June 15, 2010, in case number CR-04-450275-A, White was convicted of Aggravated Robbery with a Firearm, a felony of the first degree.

3/13/2019

White is, therefore, prohibited from legally possessing a firearm

**Conclusion**

12. Based on the preceding, I believe that probable cause exists to believe that Darnell White has violated Title 21 U.S.C. Section 841(a)(1) and (b)(1)(B) [Possession with intent to distribute of controlled substances], and Title 18 U.S.C. Section 922(g) [possession of a firearm by a prohibited person].

Adam D. West  
Adam D. West  
Special Agent  
Drug Enforcement Administration

This affidavit was sworn to by the affiant by telephone after a PDF was transmitted by email, per Crim. R. 41(d)(3) this 13th day of March, 2020.

Jonathan D. Greenberg  
JONATHAN D. GREENBERG  
UNITED STATES MAGISTRATE JUDGE

